

COPY

STEVEN S. ALM
United States Attorney
District of Hawaii

ELLIOT ENOKI
First Assistant U.S. Attorney

LESLIE E. OSBORNE, JR.,
Assistant U.S. Attorney
Room 6100, PJKK Federal Building
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850
Telephone: (808) 541-2850

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUN 21 2000
at 11 o'clock and 35 min. AM
WALTER A. Y. H. CHINN, CLERK

Attorneys for Plaintiff,
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. CR00-00261 DAE
)	
Plaintiff,)	INDICTMENT
)	[18 U.S.C. § 1001]
)	
v.)	
)	
LYONS K. NAONE III)	
)	
Defendant.)	
)	

INDICTMENT

COUNT 1

The grand jury charges that:

On or about October 5, 1997, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs

Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a) (3).

COUNT 2

The grand jury further charges that:

On or about October 18, 1997, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

..... In violation of Title 18, United States Code, Section 1001(a) (3).

COUNT 3

The grand jury further charges that:

On or about October 20, 1997, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury

Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a) (3).

COUNT 4

The grand jury further charges that:

On or about January 21, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a) (3).

/ / /
/ / /
/ / /

COUNT 5

The grand jury further charges that:

On or about January 24, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a) (3).

COUNT 6

The grand jury further charges that:

On or about April 5, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime

compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 7

The grand jury further charges that:

On or about May 3, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 8

The grand jury further charges that:

On or about September 19, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and

willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 9

The grand jury further charges that:

On or about October 22, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 10

The grand jury further charges that:

On or about December 19, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States

Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 11

The grand jury further charges that:

On or about December 27, 1998, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

/ / /
/ / /

COUNT 12

The grand jury further charges that:

On or about January 23, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 13

The grand jury further charges that:

On or about February 26, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special

overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 14

The grand jury further charges that:

On or about March 20, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

.....
COUNT 15.....

The grand jury further charges that:

On or about March 27, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs

Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a) (3).

COUNT 16

The grand jury further charges that:

On or about April 14, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a) (3).

COUNT 17

The grand jury further charges that:

On or about August 7, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the

Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 18

The grand jury further charges that:

On or about October 9, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

/ / /

/ / /

/ / /

COUNT 19

The grand jury further charges that:

On or about October 16, 1999, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

In violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 20

The grand jury further charges that:

On or about January 26, 2000, in the District of Hawaii, in a matter within the jurisdiction of the United States Customs Service, an agency of the United States Treasury Department, the Defendant LYONS K. NAONE III, knowingly and willfully made and used a material false document, a "work ticket," U.S. Customs Form 6082, in which the defendant alleged that he had worked overtime hours that entitled him to special

overtime compensation, when in truth and fact, as the defendant well knew, he had not worked the overtime hours he claimed.

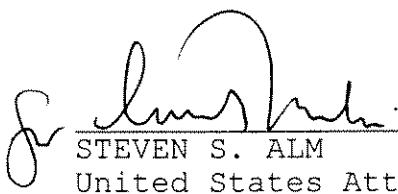
In violation of Title 18, United States Code, Section 1001(a)(3).

DATED: June 21, 2000, Honolulu, Hawaii.

A TRUE BILL

131

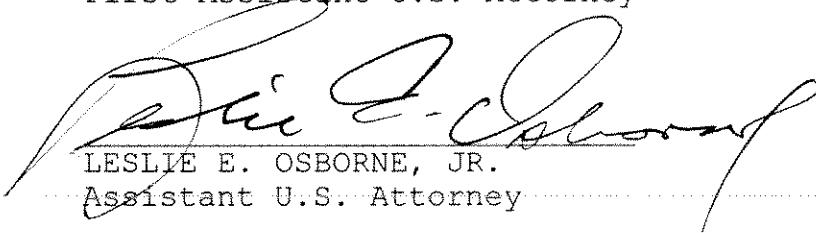
FOREPERSON, Grand Jury



STEVEN S. ALM
United States Attorney
District of Hawaii



ELLIOT ENOKI
First Assistant U.S. Attorney



LESLIE E. OSBORNE, JR.
Assistant U.S. Attorney

U.S.A. v. Lyons K. Naone, III,
CR. No.
Indictment